

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA

Plaintiff

vs.

CA No. 1:23-CV-00853-DAE

GREG ABBOTT, in his capacity as
GOVERNOR OF THE STATE OF TEXAS,
and THE STATE OF TEXAS

Defendants

DEPOSITION of THOMAS CIARAMETARO

Tuesday, July 9, 2024 - 9:22 a.m.

US Attorney's Office for the

District of Massachusetts

1 Courthouse Way, Suite 9200

Boston, Massachusetts 02210

Reporter: Jill K. Ruggieri, RPR, RMR, FCRR, CRR

Job No. CS6783958

1 What types of law would you
2 consider yourself to be an expert in?

3 A Maritime law, Chapter 90B, Mass.
4 General Laws, boating laws, maritime navigation
5 laws, stuff like that.

6 Q Okay.

7 Would you --

8 A Federal laws, maritime federal laws.

9 Q Would you consider yourself a legal
10 expert in interpretation of the Rivers and
11 Harbors Act?

12 A No.

13 Q Are you offering any -- in your
14 report any legal interpretations of the Rivers
15 and Harbors Act?

16 A I believe I do, yes.

17 Q Are you offering those as opinions to
18 be considered or just as background information
19 about the case?

20 A Background information and
21 definitionwise, or certain definitions,
22 quotations from the Rivers and Harbors Act, and
23 as background information.

24 Q Did you -- did you do that research
25 yourself or did you -- or was that something

1 that you had to rely on others --

2 A I didn't rely on anybody, but I -- it
3 was a combination of research that was provided
4 and research that I did on my own.

5 Q Are there any assumptions you were
6 asked to make by Texas that you then agreed to
7 make and incorporate into your opinion?

8 A I was given some definitions in which
9 I did not rely on. Due to my experience,
10 education and training, I came to my own
11 conclusions.

12 Q Okay.

13 So there's no -- so your report
14 does not include any definitions that you just
15 accepted and relied on from someone else.
16 If -- anything in there is something that you
17 had independently determined?

18 A There are, I believe, two definitions
19 in here which were given to me by the State of
20 Texas, but I did not solely rely on them to
21 make my determinations.

22 Q Okay.

23 Which two were those?

24 A I'd have to look. I believe there
25 may actually be one...

1 (The deponent read the
2 document.)

3 A Oh, no, it's two -- navigable
4 waters --

5 Q Can you mention for the court
6 reporter what page?

7 A Oh, sorry, page 9 of Exhibit 1,
8 navigable waters. And I believe the term
9 "buoy" on page 18 of Exhibit 1. I believe
10 that's it, unless I'm overlooking something.

11 Q And so the one -- so on page 9,
12 navigable waters, that would be beginning from
13 the sixth line down on that page?

14 A Just let me make sure... yeah, I
15 believe so.

16 Q So would I understand that correctly
17 to be the portion from that line through the
18 end of that page?

19 A Correct.

20 Q Okay. That's the navigable waters
21 definition you referred to.

22 And then on page 18, buoys.
23 Would I understand correctly that you're
24 referring to the beginning of the first line of
25 text on that page?

1 A Yes, sir.

2 Q And from there, how far down?

3 A Just that first paragraph.

4 Q Okay.

5 So that first paragraph of, I
6 think, seven lines?

7 A Correct.

8 Q Six lines. I can't count. Sorry.

9 (Laughter.)

10 A Yeah. Six. Six.

11 Q Thank you.

12 Do you consider yourself to be
13 an expert in economics?

14 A No.

15 Q So are you -- so, for example, you
16 testified earlier that some of the factors that
17 would go into whether a waterway is a highway
18 of commerce would be the conditions physically
19 of the waterway and some would be the
20 infrastructure, right?

21 A Correct.

22 Q I take it you're not offering
23 opinions in this case about -- from an
24 economist's point of view about, you know,
25 whether the cost and benefits would justify

1 creating the infrastructure in the Rio Grande
2 that might give rise to greater river-borne
3 commerce?

4 A Not specifically, but I do know that
5 part of the Army Corps's process in improving
6 infrastructure, such as dredging, is to do a
7 cost-benefit analysis.

8 Q And is that an understanding you
9 gained from your involvement in applications to
10 the USACE?

11 A Yes. And being involved in
12 implementing a dredging plan and project that
13 we -- I presented along with others to the
14 Corps.

15 The dredging of the Annisquam
16 River was a multiyear convincing, if you will,
17 of getting federal funding, because it's
18 considered a shallow-draft navigation project.

19 So there's a cost-benefit
20 analysis piece that was particularly tough for
21 us to prove, because the commerce that
22 typically uses that area is not considered
23 commerce by the Army Corps's definition, which
24 is commercial fishing.

25 It's a commercial fishing port.

1 So I'm pretty familiar with that process. Very
2 familiar.

3 Q And so you're saying in that -- in
4 that project, the commercial fishing was not
5 considered as a commerce?

6 A Correct.

7 Q How were you able to surmount that?

8 A The lack of navigability at tides --
9 certain tides created a public safety -- a
10 threat to public safety and to first
11 responders. So that's how we were ultimately
12 able to surmount that, was Gloucester's an
13 island. It's separated by the Annisquam River.
14 So if you had an emergency, let's say, on the
15 north side, you would have to travel 17 miles
16 out and around to get to that emergency. Coast
17 Guard rescue boats, harbormaster, local police,
18 at certain tides, because it was so shallow,
19 were unable to navigate the river, thus
20 increasing, you know, response time
21 exponentially.

22 So that's the case that we ended
23 up making and ultimately getting funding.

24 Q Okay.

25 And that ultimately led to the

1 prior to working on this case?

2 A I had been to the southern portion
3 near South Padre Island a long time ago, that
4 area. I don't remember the specific area we
5 were in.

6 We were on boats traversing the
7 Gulf area, but southern portion.

8 Q Okay.

9 You hadn't been further upriver
10 on the Rio Grande --

11 A No, sir.

12 Q -- prior to this case?

13 A No, sir.

14 Q And since being involved with this
15 case, you have visited the Rio Grande in the
16 vicinity of where the floating barrier is
17 located; is that right?

18 A Yes, sir.

19 Q And if I refer to "floating barrier,"
20 will you understand that to be the connected
21 objects -- buoys, as they're referred to --
22 that have been placed in the river and became
23 the subject of a lawsuit?

24 A I would.

25 Q Okay.

1 And have you visited that area
2 just one occasion or more than one?

3 A Just once.

4 Q Okay.

5 Was that June 7th of this year?

6 A Yes, sir.

7 Q Okay.

8 And with whom did you take the
9 tour that day on June 7th of that area?

10 A DPS, Department of Public Safety,
11 Texas. I believe their state police.

12 Q Did any Texas counsel attend with
13 you?

14 A No.

15 Q Do you know if any other consultants
16 to Texas in the case attended with you besides
17 yourself?

18 A Just me.

19 Q Can you describe what things -- what
20 parts of the area did you get to see that day?

21 A I believe it's called Shelby Park, is
22 where I met the state police officers. Walked
23 around that area in the park and then proceeded
24 roughly two to two-and-a-half miles southbound
25 on the Rio Grande River until we got to the

1 buoy barrier.

2 Q And about how much time did you
3 spend, you know, within sight of the buoy
4 barrier?

5 A Maybe an hour to an hour and a half,
6 maybe, roughly.

7 Q And that day as you were headed there
8 to observe it, were there particular things
9 that you intended to try to observe about, any
10 particular details that were going to be
11 important for you?

12 A The placement, how it was placed, how
13 it was constructed. I had a good
14 understanding, because from my report, on
15 page 18, you can see the buoys on land.

16 So I had kind of a good
17 understanding on what they were and how they
18 worked before I had gotten there. Observed the
19 depth of water, stuff like that.

20 Q And what did you -- once you got
21 there, what did you observe about the depth of
22 the water? What was its depth at that time?

23 A It varied, but certain parts of the
24 river seemed to be three to four feet deep; and
25 some parts of the river, there was no water at

1 And they said that they're
2 supposed to know, but they rarely do know if
3 there's going to be a release. And then what
4 that kind of looks like, how high the water can
5 get or low it can get.

6 Q What did they say in terms of how
7 high and how low the water can get?

8 A They said it can vary a couple of
9 feet in certain areas. Other areas still
10 remained dry depending on the topography of the
11 river, high spots or low spots.

12 They said it really just kind of
13 all depends on where you're at specifically in
14 the river.

15 Q Did you ask them about if there's any
16 sort of typical seasonal variation in the water
17 depth?

18 A I did not bring up seasonal
19 variation, no.

20 Q And you mentioned seeing a 14-foot
21 Border Patrol boat out that day.

22 Did you see any other boats on
23 that stretch of the river that day?

24 A No.

25 Q Earlier I asked you about the other

1 cases in your list where you're involved as an
2 expert.

3 I think I had asked this, but do
4 any of those cases involve a river
5 specifically, that type of waterway?

6 A No.

7 Q You mentioned that there were just
8 two definitions given for Texas, you've already
9 explained where those were, on page 9 and 18.

10 I just want to make sure, there
11 is a paragraph on page 32, the second paragraph
12 there when you get to that page.

13 Do you see the sentence that
14 begins, "Finally, the buoys are not other
15 structures" --

16 A That was also provided, and I had
17 previously misspoken. This was also provided.
18 I forgot that this was down towards the bottom
19 of the report.

20 Q Okay. Got it.

21 A So --

22 Q Okay.

23 So in terms of definitions given
24 to you by Texas --

25 A Mm-hmm.

1 Q -- it would be the ones you testified
2 about on page 9 and 18 --

3 A Correct.

4 Q -- and this paragraph on page 32?

5 A Yes, sir.

6 Q From -- and it's about, I'll say, a
7 ten-line paragraph beginning, "Finally, the
8 buoys are not other structures"?

9 A Correct.

10 Q Okay.

11 And that is the only portion of
12 your report that discusses that topic, correct?

13 A I believe so.

14 Q I just want to ask you something
15 about your -- this is --

16 I'm looking at Exhibit 2,
17 page 39 of 42, and there's a section on your
18 education and training.

19 A Which page was that again, sir?

20 Q Page 39 --

21 A Yeah.

22 Q -- of 42 in Exhibit 2.

23 A Yes.

24 (The deponent read the
25 document.)

1 Q So it mentions associate of applied
2 science, fire science, at North Shore Community
3 College.

4 A Correct.

5 Q And can you explain what you studied?

6 A It's chem fire and hazmat, and it's
7 exactly that. It's fire science, the science
8 of hazardous materials and combustion and fire.

9 Q Okay.

10 And then -- and then after that,
11 you acquired a bachelor of science from
12 Endicott College, correct?

13 A Yes.

14 Q And it refers to homeland security,
15 criminal justice.

16 Is that specifically -- was
17 there a specific major -- like, is it bachelor
18 of science in --

19 A Criminal justice concentrated in
20 Homeland Security studies.

21 Q Okay. Understood.

22 So the -- so the degree is
23 criminal justice but within that you had a
24 concentration in homeland security?

25 A Correct.

1 A Yes.

2 Q And this was -- you testified
3 earlier -- I was asking you, you know, what are
4 the options for improving the river's
5 navigability, and I believe you said that
6 dredging or locks and dams would be the -- were
7 the two options; is that right?

8 A Mm-hmm. Yes.

9 Q Okay.

10 And in this case, have you
11 attempted to quantify, like, how extensive, for
12 example, dredging would have to be in order to
13 make that stretch of the Rio Grande a navigable
14 channel?

15 A I have not quantified it on paper.
16 My experience is it would be very substantial,
17 considering most parts of the Rio Grande River
18 right now have no water in them or very little
19 water, and to dredge to a depth that would
20 support some kind of commerce is uncalculable
21 to me. But I'm sure it is being -- it, you
22 know, is quantifiable, for sure.

23 Q Okay.

24 A But I'm not going to throw a number
25 at it, because I just don't know.

1 I know it would be a giant
2 project, considering the smaller projects I've
3 been involved in, and how long and expensive
4 they were to complete.

5 Q But you've not gone through the
6 exercise in this case of attempting to
7 conceptually identify what would be the scale
8 of the project here, correct?

9 A Correct.

10 Q And then you've not attempted to
11 quantify what would be the cost of that project
12 at that scale?

13 A Correct.

14 Q Okay.

15 And part of that sentence I
16 read, towards the end, it refers to "sufficient
17 quantities to justify the commercial
18 navigation."

19 I take it you've also not
20 attempted to sort of define a threshold, like
21 what is sufficient to make the project
22 worthwhile?

23 A If it's not in my report, I haven't
24 quantified it.

25 Q Okay.

1 And the next sentence says,
2 "Addressing the nearly 600-foot elevation
3 changes over the 335-mile stretch from Eagle
4 Pass to Laredo, Texas, would require an
5 impractical amount of resources and
6 infrastructure investment."

7 Do you see that?

8 A I do.

9 Q And again, I take it you've not
10 attempted to sort of quantify, like, the
11 threshold at which a resource investment would
12 be impractical for a project?

13 A No.

14 Q The prior page, page 4, enumerated
15 paragraph 1, there's a sentence there, it says,
16 "The Rio Grande River between mile markers
17 275.5 and 610, and particularly in the Eagle
18 Pass area, does not meet the criteria of a
19 navigable waterway conducive to commercial
20 navigation such that it can operate as a
21 highway of commerce."

22 Do you see that sentence?

23 A I do.

24 Q You recall -- I was asking you
25 earlier if -- if a specific water, the

EXAMINATION

BY MS. AL-FUHAID:

Q I have some cross. Okay.

Mr. Ciarametaro, T.J., you testified earlier in response to one of Mr. Lynk's questions that you are a legal expert in maritime laws.

Do you recall that?

A I do.

Q You are not a lawyer, correct?

A Correct.

Q When you said that you were a legal expert in maritime laws, what did you mean?

A I mean throughout the course of my training and experience in my jobs, I've become very proficient at those specific parts of the law, such as maritime navigation laws or maritime rules of the road.

I'm an expert in that, and those are laws, so I'm -- that's what I meant by that.

Q So would it be more accurate to say that you're a navigation expert rather than a legal expert?

A Yes. I am not a lawyer.

1 Q So you also testified that you're not
2 a legal expert on the Rivers and Harbors Act.

3 Do you recall that?

4 A I do.

5 Q What did you mean by that?

6 A So I mean I'm not a lawyer. Again, I
7 am an expert in the laws pertaining to
8 permitting all these -- all structures, piers,
9 docks, boat ramps, under the Rivers and Harbors
10 Act, but I'm not a legal expert on the
11 document, but I am an expert in the permitting
12 process, which is outlined in this report.

13 Q And so is it accurate to say that you
14 have offered opinions on that process under the
15 Rivers and Harbors Act but not legal opinions?

16 A Yes. Legal opinions are left up to
17 the court.

18 Q Now, I'd like you to turn to
19 Exhibit 1, page -- let's see -- page 32.

20 A Okay.

21 Q And it's the last paragraph under
22 opinion No. 4. I'd like to direct your
23 attention to that paragraph.

24 A Okay.

25 Q Is it your opinion that the buoys do

1 not affect the course of the Rio Grande River
2 in such a manner as to impact its navigable
3 capacity?

4 A Correct.

5 Q What is the basis for that opinion
6 that the buoys do not affect the course of the
7 Rio Grande River in that manner?

8 A For all things that we discussed
9 today in this deposition, my personal
10 experience in that area, being on a boat and
11 witnessing that area firsthand, the totality of
12 this entire report gives me that opinion.

13 Q And is it your opinion that the buoys
14 do not affect the location of the Rio Grande
15 River in a manner as to impact its navigable
16 capacity?

17 A Yes.

18 Q What's the basis for that opinion?

19 A Same as what I just gave for the do
20 not affect the course.

21 Q And is it your opinion that the buoys
22 do not affect the condition of the Rio Grande
23 River in such a manner as to impact its
24 navigable capacity?

25 A Yes.

1 Q What is the basis for that opinion?

2 A Again, all the research and all the
3 photographs and all the documentation inside
4 this report, plus my firsthand eyewitness of
5 the buoy barrier in the Rio Grande gives me --
6 gives me that opinion.

7 Q Now, earlier you and Mr. Lynk
8 discussed some projects that you have worked on
9 under which you sought Section 10 permits from
10 the US Army Corps of Engineers under the Rivers
11 and Harbors Act.

12 Do you recall discussing that
13 with him?

14 A Yes, I do.

15 Q How many years of experience do you
16 have doing the permitting process under the
17 Rivers and Harbors Act -- under Section 10 of
18 the Rivers and Harbors Act?

19 A Roughly nine.

20 Q And can you estimate as to how
21 many -- just an estimate, not an exact
22 number -- can you estimate how many projects
23 you have worked on that involve that permitting
24 process?

25 A I've been involved in that process

1 from people -- private people trying to permit
2 those processes -- trying to obtain those
3 permits, or are you looking for myself
4 actively, or all together?

5 Q All together.

6 A Hundreds.

7 Q Have you -- have some of those --
8 have some of those projects been for the
9 placement of -- strike that.

10 Have you been involved in any
11 projects -- set aside whether under Section 10
12 or not, just any projects at all in which you
13 placed buoys in a waterway?

14 A Yes.

15 Q Can you give some examples of such
16 projects?

17 A Gloucester Harbor or Gloucester
18 proper, the municipality has between, like,
19 1400, 15- or 16- -- between 1400 and 1600
20 permitted moorings, mooring balls and mooring
21 buoys that are privately held but permitted
22 through the city and my department.

23 The City of Gloucester has 30
24 transient mooring buoys that we install, take
25 care of, maintain and move periodically.

1 regulatory authority to -- to enact or enforce.

2 Q But if you had legal questions, would
3 you consult the appropriate attorneys for the
4 city?

5 A Yeah, or the state or -- yes,
6 absolutely.

7 Q And you would not suggest to city
8 officials that they consult you about legal
9 issues, correct?

10 A No. I have -- no.

11 MS. AL-FUHAID: I have no
12 further questions.

13 MR. LYNK: Some cross.

14

15 FURTHER EXAMINATION

16 BY MR. LYNK:

17 Q You were testifying about an
18 opinion -- well, first, let me ask you, just to
19 make it really clear, you've been testifying
20 about a paragraph on page 32. And originally
21 in your testimony you described it as a
22 paragraph consisting of a definition received,
23 but you were explaining subsequently that there
24 could be aspects of this that were from you and
25 aspects that were received definition.

1 Do you recall the testimony?

2 A I do.

3 Q Might it be accurate that the first
4 sentence of this paragraph, which says,
5 "Finally, the buoys are not other structures
6 under the RHA," and the concluding sentence,
7 "The buoys do not affect the course, location,"
8 and it goes on to finish that sentence, do I
9 take it that those were yours?

10 A That's correct.

11 Q And then the remainder of this
12 paragraph has -- refers to a couple of
13 regulatory provisions and gives a quote or at
14 least description of content of those, and it
15 includes also a citation to a statute and a
16 case citation; is that right?

17 A Correct.

18 Q Would you say that that content would
19 be the received definition portion, or are you
20 saying some of that also was yours?

21 A No, that is -- that is the definition
22 portion. You are correct in your statement.

23 Q Okay.

24 A I got a little confused earlier,
25 because I had changed some stuff here, and --

1 but looking back and reading it thoroughly
2 again, that's a correct statement.

3 Q Understood. Glad to clear it up.

4 And in the second sentence of
5 the paragraph, in the received definition, it
6 appears to be quoting a regulatory definition
7 of "structures," right?

8 A Correct.

9 Q And it gives a long list of things.
10 It includes -- one of the things included in
11 the list is "aid to navigation."

12 Do you see that?

13 A Correct.

14 Q Is it your understanding that aids to
15 navigation -- buoys can be aids to navigation?

16 A Buoys are -- can be, yes, absolutely.

17 Q Okay.

18 So is it fair to say there may
19 be circumstances where a buoy would be covered
20 by this regulatory definition?

21 A Yes. Per- -- my understanding is
22 it's permanently affixed aids to navigation
23 that never move.

24 Q The last sentence, you were
25 testifying about earlier that the buoys -- in

1 part, it says, "do not affect the course of the
2 Rio Grande River."

3 Do you see that?

4 A I do.

5 Q And you explained generally what
6 that's based on.

7 A (Nods.)

8 Q But I wondered, in determining that
9 the buoys do not affect the course of the
10 Rio Grande River, did you attempt to take into
11 account any information that would look at, you
12 know, what are the circumstances as of when
13 they were first placed versus what are the
14 circumstances now?

15 A No. This is based on my
16 accountability of what I saw now and where they
17 are now.

18 Q And did -- do you have an
19 understanding of roughly when they were first
20 placed into the Rio Grande?

21 A I believe it's been just over a year.
22 I think it was June of 2023, I think. I -- if
23 my memory serves me correctly.

24 Q Okay.

25 Roughly a year ago from today?

1 A Mm-hmm.

2 Q And so if I understand your previous
3 answer, you did not attempt to develop
4 information that would look at, okay, you know,
5 this was the conditions of the river very
6 locally to this placement in June-July of 2023,
7 and then we're going to compare that to what
8 it's like in June or July of 2024?

9 A I've seen photographs of where they
10 were before on the Internet. I have not seen a
11 firsthand account, but they're still placed in
12 the same geographic location.

13 They're just moved, which would
14 be to the east, X amount of feet.

15 Q Have you attempted to look at whether
16 there have been any localized changes in
17 current, for example, within the close vicinity
18 of where the buoys were placed during this past
19 year?

20 A If it's not in my report, I didn't
21 have an opinion on it.

22 Q Okay.

23 And when you talk about the
24 "course," what is the course of the Rio Grande?
25 What does that mean?

1 A The direction of water flow.

2 Q Direction of water flow.

3 A (Nods.)

4 Q Okay.

5 So this is -- so this opinion
6 is -- generally, it's based on your
7 point-in-time observation when you made your
8 site visit in June of 2024?

9 A Correct. And subsequent videos of
10 the Rio Grande and so on.

11 Q Okay.

12 So subsequent -- videos taken
13 subsequently to the date of your site visit?

14 A Yes.

15 Q But not videos taken during the
16 period prior to that?

17 A I don't believe so.

18 Q Okay.

19 And the same would be true in
20 terms of what you looked at regarding
21 condition? It would be the day of your site
22 visit and videos subsequent but not information
23 prior?

24 A No, I -- there's information prior
25 from -- in the report. I think it's on page --

1 Quite a bit of information on
2 the prior, actually. Just let me find it here.

3 (Pause.)

4 A There's information here on page 11
5 of Exhibit 1 from 2001, first time in recorded
6 history, the Rio Grande was too weak to flow.

7 And I also have information
8 about an excursion here. In 2014, journalists
9 tried to traverse the entirety of the
10 Rio Grande River and were unable to due to the
11 lack of water in the Rio Grande.

12 It's called -- page 12.
13 Figure 4 has a photo of a man walking a canoe
14 down the river because it was too shallow to
15 even canoe in certain parts.

16 So there's quite a bit of
17 information historically about the flow and the
18 depths of the Rio Grande in this report.

19 Q Those references are from prior to
20 the first placement of this buoy barrier,
21 right?

22 A Correct.

23 Q Okay.

24 So -- so to -- so it would be
25 accurate to say that in looking at the buoys

1 not having affected condition, you had earlier
2 information -- historic information, as you
3 called it, and information about the condition
4 at the time of the site visit, and video
5 information afterward, but not information
6 during the period from roughly June 2023 up
7 until before the site visit?

8 A Correct.

9 Q Can buoys cause very localized
10 eddies, for example, in the water?

11 A They can.

12 Q Can they cause localized changes in
13 direction of flow?

14 A In -- changes in direction of flow?

15 Q Yes.

16 A No, in a river, no.

17 Q Eddies, yes. Not changes in flow.

18 All right.

19 And is that -- is that -- would
20 that be an example of something that you looked
21 at specifically in determining that the buoys
22 didn't affect the course or condition?

23 A Yes.

24 Q Okay.

25 And again, you would have looked

1 at that during your site visit, you would have
2 looked at the video that was taken afterward,
3 not evidence taken during the period from
4 June 2023 up until the site visit?

5 A I believe that's correct.

6 Q You mentioned that you -- you
7 testified about the number of permit
8 applications you had been involved with and
9 whether any were for buoys.

10 Have you ever been involved with
11 something that resembles this buoy barrier,
12 like a thousand-foot connected string of buoys?

13 A Nothing quite that long.

14 Q Okay.

15 Have you ever applied for a
16 permit for any type of structure of that size?

17 A No. Of buoys? No.

18 Q Okay.

19 Any type of structure that size?

20 A Not quite a thousand feet. Probably
21 200 -- 2- to 300-foot pier, pile-supported pier
22 with a docking gangway attached.

23 Q Okay.

24 Have you -- for any of the buoys
25 that you placed, were they moored with concrete